

## REMARKS/ARGUMENTS

Claims 1-42 are in the case. Claims 1-20 have been withdrawn as nonelected. Claims 21-42 are being examined.

The office action mailed June 7, 2007 has been studied and it is believed that the application is in condition for allowance. Reconsideration and reexamination are respectfully requested.

Applicants have amended claims as set forth above. Applicants are not conceding in this application that those claims as originally filed are not patentable over the art cited by the Examiner, as the claim amendments are only for facilitating expeditious prosecution. Applicants respectfully reserve the right to pursue these and other claims in one or more continuations and/or divisional patent applications.

The Examiner has rejected claims 21-42 under 35 U.S.C. 103(a) as being unpatentable over Yang (WO-031017598) and Sarkar et al., "Storage over IP: When Does Hardware Support Help." This rejection is respectfully traversed.

Claim 21, for example, is directed to a system having both a target controller and a network controller in which the target controller is adapted for "... managing Input/Output (I/O) access to the data storage, including processing read commands addressing target data having target addresses within said target storage" and an offload engine of the network controller is adapted "receive from the initiator, a packet containing a read command which addresses target data having a target address within said target storage; and compare the target address of the read command to a target address of the target data in the cache for the network controller engine; wherein said offload engine is adapted to process said read command if target data stored in the cache was obtained from a target address which corresponds to the read command target address, said processing including sending target data stored in the cache through the network to the initiator and wherein said read command is processed by said network controller instead of said target controller."

Thus, as explained in greater detail in the present specification, the network controller can read commands encapsulated in a network packet, and respond to an initiator with read data from the network controller cache, if the data cached in the network controller cache satisfies the read request from the initiator. As a consequence, a read command may be processed by the network controller instead of said target controller, and the transmission of network commands

over a bus to the target controller can be avoided, in some circumstances, to improve target efficiency. It is appreciated that other features may be obtained in addition to or instead of, improvements in efficiency, depending upon the particular application.

It is the Examiner's position that the network controller 42 of the Yang reference has "an offload engine and a cache adapted to store target data from at least one target address of said target data storage (pg. 7, lines 19-pg. 9, lines 1-3), said network controller being adapted to: receive from the initiator (100), a packet containing a read command which addresses target data having a target address within said target storage; and compare the target address of the read command to a target address of the target data, in the cache for the network controller engine; wherein said offload engine is adapted to process said read command if target data stored in the cache was obtained from a target address which corresponds to the read command target address, said processing including sending target data stored in the cache through the network to the initiator. (pg.10, lines 9 - col. 11, lines 1, 2, Figs. 1-4)." The applicants strongly disagree.

It is respectfully submitted that the Examiner has cited no portion of the Yang reference which indicates that the network controller 42 of the Yang reference is adapted to "... compare the target address of the read command to a target address of the target data in the cache for the network controller engine; wherein said offload engine is adapted to process said read command if target data stored in the cache was obtained from a target address which corresponds to the read command target address, said processing including sending target data stored in the cache through the network to the initiator and wherein said read command is processed by said network controller instead of said target controller" as required by claim 21. While it appears that the processing unit 44 of the storage system 12 processes read commands to read data from the storage device 54 ( or data cached in the system cache 48, 52), the Examiner has cited no portion of the Yang reference which teaches or suggests that the *network controller 42* is adapted to both cache data from the storage device 54 and process read commands using data cached in the network controller 42. Accordingly, it is clear that the Examiner has cited no portion of the Yang reference which teaches or suggest read commands being "processed by said network controller instead of said target controller" as required by claim 19.

The deficiencies of the Examiner's citations to the Yang reference are not met by the Examiner's citations to the Sarkar reference. It is respectfully submitted that the Examiner has

cited no portion of the Sarkar reference which indicates that the NIC of the Sarkar reference is adapted to “ ... compare the target address of the read command to a target address of the target data in the cache for the network controller engine; wherein said offload engine is adapted to process said read command if target data stored in the cache was obtained from a target address which corresponds to the read command target address, said processing including sending target data stored in the cache through the network to the initiator and wherein said read command is processed by said network controller instead of said target controller” as required by claim 21. Independent claim 33 may be distinguished in a similar fashion.

The remaining claims depend either directly or indirectly from the independent claims. Accordingly, the rejection of these claims is improper for the reasons given above. Moreover, the dependent claims include additional limitations, which in combination with the base and intervening claims from which they depend provide still further grounds of patentability over the cited art. For example, dependent claims 28-30 recite wherein both the “ target controller includes a state machine having Internet Small Computer System Interface session state variables” and the “network controller includes a state machine having at least one Internet Small Computer System Interface session state variable” and wherein the “network controller is further adapted to synchronize a value of said network controller state variable to a value of said target controller state variable in connection with offload engine translating said target data to be sent to said initiator into an Internet Small Computer System Interface data sequence.” The Examiner has cited no portion of the Yang or Sarkar references which teach or suggest such a combination.

### Conclusion

For all the above reasons, Applicant submits that the pending claims 21-42 are patentable. Should any additional fees be required beyond those paid, please charge Deposit Account No. 50-0585.

The attorney of record invites the Examiner to contact him at (310) 553-7977 if the Examiner believes such contact would advance the prosecution of the case.

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